



**Marathon
Oil Company**

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September 27, 2001

Chair, Council on Environmental Quality
Executive Office of the President
Attention: Task Force
17th and G Streets, NW
Washington, DC 20503

Re: Desolation Flats Natural Gas Development Environmental
Impact Statement, Sweetwater and Carbon Counties, Wyoming

Ladies and Gentlemen:

Marathon Oil Company (Marathon), Wyoming's largest oil producer, respectfully requests the opportunity to submit comments concerning the Desolation Flats Environmental Impact Statement. Please note Marathon's comments are in the form recommended by the CEQ Task Force, as outlined on the White House website.

1. Name of Project: Desolation Flats Natural Gas Development Environmental Impact Statement, Sweetwater and Carbon Counties, Wyoming, Rawlins Field Office.
2. Entities Proposing the Project: Marathon Oil Company, EOG Resources, Inc, Tom Brown, Inc., Stone Energy, LLC, Questar Exploration and Production Company, Merit Energy Company, Yates Petroleum Corporation, Devon SFS Operating, Inc., Cabot Oil & Gas Corporation, and AEC Oil & Gas (USA) Inc.
3. Category of the Project: Oil and Gas Environmental Impact Statement (EIS)
4. Description of the Project: An EIS to analyze a proposal made by Marathon and the other operators to drill an additional 385 wells at 361 well locations in the Desolation Flats project area. Some of these wells would be classified as exploration/delineation wells because natural gas production potential has not been totally defined due to geological complexities. Other wells, where production potential is better known, would be classified as in-fill or development wells. Drilling is expected to last for approximately 20 years, with a life-of-project (LOP) of 30-50 years.
5. Agencies Involved:

Federal:	Department of the Interior, Bureau of Land Management, Rawlins Field Office (Lead Agency) Environmental Protection Agency, Region 8 (EPA) Department of the Interior, U. S. Fish & Wildlife Service
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6. Reason for Task Force's Attention: Biodiversity Associates have submitted a citizens' proposal to expand the existing Adobe Town Wilderness Study Area (WSA). BLM must evaluate this new proposal in accordance with its Wilderness Inventory and Study Procedures Handbook (H-6310-1) dated January 10, 2001. This area was previously analyzed in accordance with Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) and BLM's wilderness recommendations were made in its Wyoming Statewide Wilderness Study Report, Wilderness Study Areas Specific Recommendations (BLM Report), dated September 1991. The BLM Report recommends that out of the 85,710 acre WSA, 10,920 should be designated as wilderness while the remaining 74,790 acres be released for multiple use. The BLM Report recognizes an estimated natural gas reserve within the WSA in excess of one trillion cubic feet. However, the citizen proposal expands the WSA by over 100,000 acres.
7. Recommendations: The BLM's Washington office should immediately rescind the revised H-6310-1 Handbook and reinstate the previous Handbook.

The Department of the Interior should instruct BLM that, as per FLPMA, they are obligated to maintain wilderness inventories, develop land use plans, and that the time in which to identify new lands for wilderness lapsed on October 21, 1991.

Please find attached a map outlining the Desolation Flats EIS boundary, the WSA boundaries, and the Biodiversity Associates proposal. Should you have any questions or comments concerning the foregoing, please feel free to contact the undersigned at (307) 527-2215.

Respectfully submitted,

MARATHON OIL COMPANY



W. L. Browne
Operations Manager
Rocky Mountain Operations

WLB:mes
Attachment
xc: The Honorable Jim Geringer, Governor of the State of Wyoming
U. S. Representative Barbara Cubin
U. S. Senator Craig Thomas
U. S. Senator Mike Enzi
Mr. Douglas E. Thierwechter
Ms. Paula Freer
Petroleum Association of Wyoming
Public Lands Advocacy

